### UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MASSACHUSETTS

	)	
CHRISTINA R. CURCURU,	j	
	)	
Plaintiff,	)	
	)	
<b>v.</b>	)	C.A. No. 03 12599 JLT
	)	
MASSACHUSETTS BAY	)	
TRANSPORTATION AUTHORITY	)	
and AMTRAK,	)	
	)	
Defendants.	)	
	)	

## JOINT STATEMENT PURSUANT TO LOCAL RULE 16.1

Plaintiff Christina Curcuru ("Ms. Curcuru"), Defendant Massachusetts Bay Transportation Authority ("MBTA"), and Defendant National Railroad Passenger Corporation ("Amtrak") submit this Joint Statement pursuant to LR 16.1 and the Court's Notice of Scheduling Conference, dated September 20, 2005.

#### I. JOINT DISCOVERY PLAN

May 1, 2006 Completion of all written discovery and depositions, expert designations and answers to expert interrogatories.

June 5, 2006 Completion of expert depositions.

# II. PROPOSED SCHEDULE FOR FILING OF MOTIONS

July 10, 2006

Filing of all dispositive motions.

#### III. CERTIFICATIONS OF COUNSEL & AUTHORIZED REPRESENTATIVES

The certifications of the parties and their counsel will be filed at the Scheduling Conference.

#### IV. PROPOSED AGENDA FOR SCHEDULING CONFERENCE

The parties propose the following agenda for the Scheduling Conference:

- Pretrial schedule of discovery and motions.
- Status of settlement discussions.

#### V. TRIAL BY MAGISTRATE

The parties do not consent to trial by magistrate judge.

WHEREFORE, Ms. Curcuru, the MBTA, and Amtrak request that the Court approve their proposed discovery and motion schedules, with such amendments as the Court deems just and proper.

#### Respectfully submitted,

PLAINTIFF, Christina Curcuru, By her attorney, DEFENDANT, National Railroad Passenger Corp. By its attorneys,

#### s/John P. Matheson

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### s/Stephen E. Hughes

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DEFENDANT, Massachusetts Bay Transportation Authority, By its attorneys,

s/Paul J. Sahovey

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